

Eric B. Fisher  
 Binder & Schwartz LLP  
 675 Third Avenue, 26<sup>th</sup> Floor  
 New York, NY 10017

(T) 212.933.4551  
 (F) 212.510.7299  
 efisher@binderschwartz.com

November 22, 2023

**By ECF**

Hon. Paul A. Engelmayer  
 United States District Court  
 Southern District of New York  
 40 Foley Square, Room 2201  
 New York, New York 10007

Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd., et al.*,  
No. 1:22-cv-02943 (PAE) [Rel. No. 1:23-cv-04774]

Dear Judge Engelmayer:

We represent Frontier Airlines, Inc. (“Frontier”) in the above-captioned proceedings. We write jointly on behalf of all parties, and pursuant to Rule 1.E. of Your Honor’s Individual Rules, to respectfully request that the Court revise the discovery schedule in this action to correspond with the modified schedule entered by the Court in the related action, *Carlyle Aviation Management Ltd. v. Frontier Airlines, Inc.*, No. 1:23-cv-04774 (PAE) (“Lawsuit 3”). See Dkt. No. 139. The modified schedule, set forth below, will allow the parties to continue to coordinate discovery across the two cases. As the Court is aware, the cases involve some of the same agreements and parties, and prior to entry of the revised discovery order in Lawsuit 3, the two actions were on the same discovery schedule, *see* Dkt. No. 103; Lawsuit 3, Dkt. No. 21.<sup>1</sup> As with Lawsuit 3, good cause exists to extend the discovery schedule, as the parties have exchanged discovery requests and responses in accordance with the current Case Management Plan and are presently engaged in document discovery.

The parties respectfully request the Court enter the same case management deadlines entered in Lawsuit 3, which are set forth below and agreed to by all parties:

Event	Current Deadline	Proposed Deadline
Fact Discovery Deadline	December 22, 2023	March 22, 2024
Deadline to Serve Interrogatories	November 17, 2023	February 21, 2024

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<sup>1</sup> Frontier moved in Lawsuit 3 to consolidate the cases, which motion remains pending before the Court. See Lawsuit 3, Dkt. No. 38.



Deadline to Serve Requests to Admit	November 17, 2023	February 21, 2024
Deadline to Complete Fact Depositions	December 22, 2023	March 22, 2024
Deadline to Complete Expert Discovery	March 1, 2024	June 5, 2024

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Eric B. Fisher

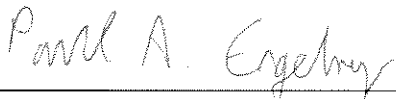
Eric B. Fisher

cc: All Counsel of Record (via ECF)

GRANTED. The Court *sua sponte* reschedules the next case-management conference in this case, and in the related case, to **April 23, 2024, at 10 a.m.**

SO ORDERED.

Dated: November 22, 2023  
New York, New York

  
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PAUL A. ENGELMAYER  
United States District Judge